

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LUZ TEXIDOR,

Case No.: 1:21-cv-4845-RPK-LB

Plaintiff,

-against-

TROMBERG, MORRIS, & POULIN, PLLC
f/k/a **STEPHEN EINSTEIN & ASSOCIATES, P.C.,**
STEPHEN EINSTEIN,
COLLINS FINANCIAL SERVICES, INC.,
ABC PROCESS SERVING BUREAU, INC., d/b/a
ABC PROCESS SERVICE,
AZZAM ABDERRAHMAN, and
JAY BRODSKY,

Defendants.

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STIPULATION TO FACILITATE SETTLEMENT DISCUSSIONS

In order to facilitate frank and productive settlement discussions, the Parties hereby stipulate that all settlement offers and statements made during settlement negotiations are confidential and inadmissible, and shall not be disclosed including, *inter alia*, to the court, or in connection with any filing or hearing in this action except in connection with a settlement conference or mediation.

AGREED:

The Law Offices of Ahmad Keshavarz
Counsel for Plaintiff LUZ TEXIDOR

/s/ Ahmad Keshavarz
By: _____ Date: _____
Ahmad Keshavarz

AGREED:

Corey Stark
Corey Stark PLLC
Attorneys for Defendants ABC Process Serving Bureau, Inc. and Jay Brodsky

/s/ Corey Stark 10/20/2022
By: _____ Date: _____
Corey Stark

AGREED:

Arthur Sanders
Barron & Newburger, P.C.
Attorneys for Tromberg Defendants

/s/ Arthur Sanders 10/20/2022
By: _____ Date: _____
Arthur Sanders